

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: BP P.L.C. SECURITIES  
LITIGATION

MDL No. 2185  
Civil Action No. 4:10-md-02185

Hon. Keith P. Ellison

*Document relates to the ERISA ACTIONS:*

Moule v. BP Corp. North America, Inc., et al.,  
No. 4:10-cv-04289 (S.D. Tex.)

Arshadullah, et al. v. BP P.L.C., et al., No.  
4:10-cv-04294 (S.D. Tex.)

Whitley v. BP P.L.C., et al., No. 4:10-cv-04214  
(S.D. Tex.)

McGuire v. BP Corp. North America, Inc., et  
al., No. 4:10-cv-04301 (S.D. Tex.)

Riely v. BP Corp. North America, Inc., et al.,  
No. 4:10-cv-04306 (S.D. Tex.)

Humphries v. BP Corp. North America, Inc.,  
et al., No. 4:10-cv-04300 (S.D. Tex.)

Mineman v. BP Corp. North America, Inc., et  
al., No. 4:10-cv-04305 (S.D. Tex.)

Soesman v. BP Corp. North America, Inc., et  
al., No. 4:10-cv-04307 (S.D. Tex.)

DECLARATION OF W. MARK LANIER IN SUPPORT OF  
PLAINTIFFS' AMENDED MOTION FOR ENTRY OF [PROPOSED]  
ORDER APPOINTING INTERIM CO-LEAD AND LIAISON COUNSEL

I, W. Mark Lanier, declare under penalty of perjury as follows:

1. I am an attorney duly licensed to practice before all the Courts of the State of Texas. I am a member of the Lanier Law Firm, one of the counsel of record for plaintiffs Charis Moule in *Moule v. BP Corp. North America, Inc., et al.*, Case No. 1:10-cv-04289, Jerry T. McGuire in *McGuire v. BP Corp. North America, Inc., et al.*, Case No. 1:10-cv-04301, and

Maureen S. Reily in *Reily v. BP Corp. North America, Inc., et al.*, Case No. 1:10-cv-04306, in the United States District Court for the Southern District of Texas, Houston Division. These cases are ERISA actions that have been transferred to this Court pursuant to a Conditional Transfer Order entered in MDL No. 2185 on October 29, 2010 by the United States Judicial Panel on Multidistrict Litigation.

2. I have personal knowledge of the matters stated herein, and if called upon, I could and would competently testify thereto.

3. I submit this Declaration in support of Plaintiffs' Amended Motion for Entry of [Proposed] Order Appointing Interim Co-Lead and Liaison Counsel ("Amended Motion") by plaintiffs Charis Moule, Jerry T. McGuire, and Maureen S. Reily, dated November 24, 2010.


4. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Motion for Entry of [Proposed] Pretrial Order No. 1: (1) Consolidating the Related ERISA Actions and (2) Appointing Interim Co-Lead and Liaison Counsel, filed on July 30, 2010 in the Northern District of Illinois and appearing as docket entry number 31 in Case No. 10-cv-4289 (S.D. Tex.), now pending before this Court.

5. Attached hereto as Exhibit 2 is a true and correct copy of the Memorandum of Law in Support of Plaintiffs' Motion for Entry of [Proposed] Pretrial Order No. 1: (1) Consolidating the Related ERISA Actions and (2) Appointing Interim Co-Lead and Liaison Counsel, filed on July 30, 2010 in the Northern District of Illinois and appearing as docket entry number 32 in Case No. 10-cv-4289 (S.D. Tex.), now pending before this Court.

6. Attached hereto as Exhibit 3 is a true and correct copy of the [Proposed] Order Appointing Interim Co-Lead and Liaison Counsel for the Court's consideration, pursuant to Plaintiffs' Amended Motion.

7. I declare under penalty of perjury under the laws of the State of Texas that the foregoing facts are true and correct.

Executed this 24th day of November, 2010 at Houston, Texas.

  
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W. Mark Lanier